

2016 JUL 15 AM 11: 33

1125 Atlantic Avenue Atlantic City, NJ 08401 Phone: 609.344.3161 Toll Free: 800.529.3161 Fax: 609.344.0939 www.cooperlevenson.com

OFFICE OF GENERAL

RANDOLPH C. LAFFERTY .
Certified by the NJ. Supreme Court as a Civil Trial Attorney EMAIL: rlafferty@cooperlevenson.com

Direct Phone (609) 572-7390 Direct Fax (609) 572-7391

FILE NO. 58235-1

July 14, 2016

Via UPS - Overnight Mail

MUR # 7107

Jeff S. Jordan, Assistant General Counsel Complaints Examination & Legal Administration Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

Dear Mr. Jordan:

In response to your letter of June 28, 2016, I am enclosing a Complaint dated July 14, 2016 executed by Richard L. DeFeo before a Notary Public regarding the activities of Progress United PAC. I am enclosing the original of the properly notarized Complaint as well as there copies. We now anticipate that this Complaint will be appropriately processed.

If there is anything further that you require of us, please advise.

Very truly yours,

Randolph C. Lafferty

RCL/sih - enc.

cc: Richard DeFeo (Via Email)

w/enc.

CLAC 3636437.1

## MUR # 7107

## FEDERAL ELECTION COMMISSION

IN RE PROGRESS UNITED PAC,
An Independent-expenditure only Committee (aka "SuperPAC')

## **COMPLAINT**

- I, Richard L. DeFeo, reside at in Mays Landing, New Jersey
   08330. I am a registered voter in Atlantic County, New Jersey, and am a member of the Atlantic
   County Republican Committee.
- 2. I am making this Complaint regarding the entity known as Progress United PAC, an entity I believe is a SuperPAC, based upon information known or believed by me to be true and accurate.
  - 3. The specific acts of which I complain are as follows:
    - a. Progress United PAC failed to file the required 48 hour notice of expenditures
       made by it, as such expenditures are outlined below.
    - b. Progress United PAC apparently paid for a web page (www.bailoutbrown.org), web ads (sample attached) and radio ads which ran the week of May 9<sup>th</sup>, 2016. Despite the considerable monies obviously expended, no financial report from Progress United PAC was posted on the FEC website.
    - c. In their website ad web ads, Progress United PAC failed to meet the disclosure requirements for Independent Expenditures. For messages that are not authorized, and are not financed by a candidate or a candidate committee, the disclaimer statement must:

- State that the communication is not authorized by any candidate or the candidate's committee; and
- Identify the name and street address, telephone number or World Wide Web address of the person who financed the communication. 11 CFR 109.11, 110.11(a)(2) and (b)(3).

Progress United PAC disclosed its name, but no other required information.

RICHARD L. DEFEO

Sworn and subscribed to before me this 14th day of July, 2016.

Notary Public

MOTARY PUBLIC OF NEW JERSEY COMMISSION EXPIRES 8/21/2017